

DOCKET FILE COPY ORIGINAL

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

MAY 21 1997

Federal Communications Commission  
Office of Secretary

In the Matter of )  
)  
)

Implementation of the Pay Telephone )  
Reclassification and Compensation )  
Provisions of the Telecommunications )  
Act of 1996 )  
)

CC Docket No. 96-128

**OPPOSITION OF THE AMERICAN PUBLIC COMMUNICATIONS  
COUNCIL TO U S WEST'S AMENDMENT TO ITS CEI PLAN**

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Communications Council

May 21, 1997

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of )

Implementation of the Pay Telephone )  
Reclassification and Compensation )  
Provisions of the Telecommunications )  
Act of 1996 )

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CC Docket No. 96-128

**OPPOSITION OF THE AMERICAN PUBLIC COMMUNICATIONS  
COUNCIL TO U S WEST'S AMENDMENT TO ITS CEI PLAN**

Pursuant to Section 1.41 of the Commission's Rules, 47 C.F.R. § 1.41, the American Public Communications Council ("APCC")<sup>1</sup> hereby urges the Commission to reject the "Amendment of Plan of U S West, Inc. to Offer Comparably Efficient Interconnection for Payphone Services," filed April 25, 1997 ("U S West's CEI Amendment").<sup>2</sup> In the Amendment, U S West deleted "CUSTOMNET" service from its CEI plan, claiming that under the criteria in the Common Carrier Bureau's April 4, 1997

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<sup>1</sup> APCC is a national trade association of some 1,200 independent (non-telephone company) providers of pay telephone equipment and services. APCC's purpose is to promote fair competition and high standards of service in the payphone and public communications markets.

<sup>2</sup> A copy of U S West's CEI Amendment (without attachments) is attached for the Bureau's convenience as Exhibit 1.

Clarification Order,<sup>3</sup> federal tariffing of CUSTOMNET is not required. In the Clarification Order, the Bureau explained the scope of the Payphone Orders' requirement that local exchange carriers ("LECs") file federal as well as state tariffs for "unbundled features and functions" offered to payphone service providers ("PSPs").<sup>4</sup>

U S West is applying a constricted interpretation of the Clarification Order in an attempt to circumvent its tariffing obligations under the Payphone Orders. The Commission should reject U S West's CEI Amendment and require U S West to tariff CUSTOMNET as a payphone-specific, network-based, unbundled service pursuant to the Payphone Orders.

### **BACKGROUND**

In the Payphone Orders, the Commission required that, in addition to tariffing a "basic payphone line" in state jurisdictions, LECs must tariff, in both the federal and state

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<sup>3</sup> Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-678, released April 4, 1997 (CCB) ("Clarification Order"). The Clarification Order clarified Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Report and Order, FCC 96-388, released September 20, 1996 ("Payphone Order"), Order on Reconsideration, FCC 96-439, released November 8, 1996 ("Reconsideration Order"). The Payphone Order, Reconsideration Order and Clarification Order are referred to collectively herein as the Payphone Orders.

<sup>4</sup> On May 5, 1997, APCC filed a petition for clarification or in the alternative reconsideration of the Clarification Order. Further clarification is necessary because U S West and possibly other LECs are relying on the Clarification Order as an excuse for failing to federally tariff their blocking and screening services, even though call blocking and call screening were specifically cited in the Clarification Order as examples of "payphone-specific" services that "must be federally tariffed if they are offered on an unbundled basis . . . ." Clarification Order, ¶ 18 & n.49.

jurisdictions, "any basic network services or unbundled features." Reconsideration Order, ¶¶ 162, 163. As the Commission noted, federal tariffing "enables the Commission to directly ensure that payphone services comply with Section 276." Id., ¶ 162. Specifically, federal tariffing helps ensure that important services needed by PSPs are available at cost-based, nondiscriminatory rates, thereby promoting both payphone competition and "the widespread deployment of payphone services to the benefit of the general public." Clarification Order, ¶ 3 (quoting 47 U.S.C. § 276(b)).

Among the most important "unbundled features" to which PSPs subscribe are call screening and call blocking services. These services have long been recognized as critically important in preventing fraud.<sup>5</sup> More recently, call screening service has become even more important to PSPs. In the Payphone Orders, the Commission *required* PSPs, in order to be eligible for compensation, to subscribe to services that transmit "discrete" identifying digits to IXC's to enable IXC's to track compensable calls from payphones. Reconsideration Order, ¶ 94. It is APCC's understanding that CUSTOMNET provides for the transmission of the "07" screening code, currently used to identify the payphone lines used by "smart" payphones.<sup>6</sup>

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<sup>5</sup> See, e.g., Policy and Rules Concerning Operator Service Access and Pay Telephone Compensation, CC Docket No. 91-35, 7 FCC Rcd 4355, 4359-62 (requiring LECs to offer certain blocking and screening services).

<sup>6</sup> In CC Docket No. 91-35, the Commission required LECs to provide "originating line screening" ("OLS") service under federal tariff. OLS service, which is offered to *IXCs*, is different from (although related to) the screening service currently provided to *PSPs*. The "07" or "70" codes involved in OLS will not be transmitted to IXC's unless PSPs subscribe to a service that provides for transmission of the codes. While some LECs currently bundle call screening into the price of a COCOT line, other LECs

(Footnote continued)

On January 15, 1997, U S West filed a federal "payphone compliance" tariff, wherein U S West tarified, among other services, its CUSTOMNET blocking and screening service. APCC requested investigation of the tariff filing because U S West was proposing to charge \$5.00 per line per month for CUSTOMNET, which according to its own cost support, costs only \$0.01 per line per month. U S West Communications, Inc., Revision of Tariff F.C.C. No. 5, Transmittal No. 823, Petition of the American Public Communications Council to Suspend and Investigate, filed February 10, 1997, at 5 and Attachment 2.

Meanwhile, in response to the CEI Plans filed by other Bell companies, APCC objected that a number of the Bell companies had failed to even file a federal tariff for their call screening services. In the Clarification Order, ¶ 18 & n.49, the Bureau clarified that "payphone-specific" features and functions such as call screening and call blocking must be federally tarified when offered on an unbundled basis. The Bureau further clarified that payphone-specific features and functions "do not include . . . features and functions that [1] are generally available to all local exchange customers *and* [2] are only incidental to payphone service . . . ." *Id.* (emphasis added). The Bureau also required LECs to identify by April 10, 1997, all functions that they intended to federally tariff, as a condition of receiving a limited waiver of the deadline for filing federal tariffs.<sup>7</sup>

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(Footnote continued)

(including, apparently, U S West) require PSPs to separately subscribe to a screening service such as CUSTOMNET.

<sup>7</sup> The Commission waived the January 15, 1997 filing deadline for federal tariffs for 45 days from the April 4, 1997 Clarification Order, with a scheduled effective date 15  
(Footnote continued)

On April 10, 1997, when its January 15, 1997 federal tariff was still pending, U S West filed a letter pursuant to the Clarification Order, representing that "[U S West] federally tariffed the network-based payphone specific unbundled features and functions in its intrastate tariffs on January 15, 1997 . . . and is in full compliance with the Commission's federal tariffing requirements . . . ." On April 15, citing U S West's April 10 letter,<sup>8</sup> the Bureau approved U S West's CEI Plan. On April 14, however, U S West deleted its CUSTOMNET service from its federal payphone compliance tariff filing. There is no indication that the Commission's CEI review Staff considered U S West's April 14 filing or was even made aware of it prior to issuing the order approving U S West's CEI Plan.

Now that its CEI Plan has already been approved, U S West seeks to delete CUSTOMNET from the CEI Plan, claiming that CUSTOMNET need not be federally tariffed after all. According to U S West, CUSTOMNET is not payphone-specific because it "is also used by numerous end-user customers other than payphone service providers," and 70% of its CUSTOMNET lines are business or residential lines. U S West's CEI Amendment, 2. Therefore, under the Clarification Order, U S West asserts it does not have to federally tariff CUSTOMNET.

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(Footnote continued)  
days after filing. Clarification Order, ¶ 21.

<sup>8</sup> U S West's Comparably Efficient Interconnection Plan for Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-796, Released April 15, 1997 (CCB) ("U S West CEI Order"), ¶ 50 & n.124.

## DISCUSSION

U S West's action violates the Payphone Orders, including the Clarification Order. First, U S West's CUSTOMNET service is a package of blocking and screening options. See U S West's January 15, 1997 Transmittal No. 823 (portions of which are attached as Exhibit 2 for the Commission's convenience). The Bureau *expressly identifies* call screening and call blocking services as "payphone-specific, network-based" features that must be federally tariffed when offered on an unbundled basis. Clarification Order, ¶ 18 & n.49. Thus, U S West is ignoring the plain language of the Clarification Order.

Second, CUSTOMNET meets the Bureau's definition of "payphone-specific" in the Clarification Order. U S West claims that CUSTOMNET cannot be "payphone-specific" because it is "generally available to all U S West end-user customers." U S West's CEI Amendment at 2. However, in order to qualify as a feature that is not payphone-specific, the feature must be *both* "generally available to all local exchange customers *and* only incidental to payphone service." Clarification Order, ¶ 18 (emphasis added). Blocking and screening services are clearly not "incidental to payphone service" because the Commission has recognized the particular importance of these services to PSPs. In fact, the Commission has required PSPs to subscribe to services that provide screening codes in order to qualify for compensation under the Payphone Orders. Reconsideration Order, ¶ 94. Moreover, as the Commission has recognized, call screening and call blocking services are critically important in preventing fraud.<sup>9</sup> Thus, CUSTOMNET is not incidental -- it is *essential* -- to PSPs.

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<sup>9</sup> See, supra, note 5 and accompanying text.

Third, U S West admits that some 30% of its "CUSTOMNET lines" are payphone lines. The percentage of CUSTOMNET lines subscribed to by PSPs is not as indicative of the importance of CUSTOMNET to PSPs as the percentage of U S West's "COCOT" lines<sup>10</sup> that include CUSTOMNET -- which U S West fails to provide -- because PSPs account for a relatively small portion of U S West's subscribers.<sup>11</sup> Nonetheless, the data provided by U S West shows that even though PSPs account for a very small percentage of U S West's overall customer base, roughly one out of every three or four CUSTOMNET lines are payphone lines. This demonstrates the importance of CUSTOMNET to PSPs.

In any event, whether all -- or even a majority -- of the subscribers to a feature are PSPs is irrelevant to characterizing a feature as "payphone-specific." The Clarification Order cites as "payphone-specific" several other features that are commonly available to entities other than PSPs. For example, answer supervision is specifically cited as a payphone-specific feature, Clarification Order, ¶ 18, even though it is available to ESPs and

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<sup>10</sup> U S West refers to its COCOT service as "Public Access Line (PAL)" service.

<sup>11</sup> In other words, U S West does not provide enough information in its CEI amendment to analyze its claim regarding the relative use of CUSTOMNET by PSPs and non-PSPs. U S West simply states that "more than 70% of CUSTOMNET lines are residential and business lines, not payphone lines." U S West's CEI Amendment at 2. U S West also does not specify whether the percentage of payphone and non-payphone lines varies for Option 1, which includes a "no-PIC" blocking service, versus Option 2, which excludes the "no-PIC" blocking service. See Tariff FCC No. 5, § 13.3.19.C. It is also unclear whether U S West's 30% figure, which is based on March, 1997 data, includes U S West's own payphones, many of which became officially "subscribers" to CUSTOMNET on April 15, 1997, when LECs were required to remove their payphones from their regulated rate bases.



other non-payphone subscribers. The Bureau also specifically cited IDDD blocking as a payphone-specific service. *Id.*, ¶ 18 n.49. The Commission recently required LECs to offer IDDD blocking to business customers, in addition to PSPs.<sup>12</sup> The Bureau would not have cited answer supervision and IDDD blocking as payphone-specific services if it had intended to require federal tariffing of only services offered exclusively or predominantly to PSPs.

Finally, in defining the features that must be federally tariffed, the Bureau states that unbundled features are similar to basic service elements ("BSEs") under the Computer III Open Network Architecture ("ONA") regulatory framework. E.g., Clarification Order, ¶¶ 9 & n.25, 17 (citing Computer III line of cases). In keeping with that parallel, "payphone-specific" features include "features that [a PSP] may require or find useful in configuring its [payphone] service," and are not limited to features offered exclusively, or even predominantly, to PSPs. Clarification Order, ¶ 17 (citing Filing and Review of Open Network Architecture Plans, Phase I, Memorandum Opinion and Order, FCC 88-381, 4 FCC Rcd 1 (1988) (" BOC ONA Order")).

In the BOC ONA Order, the Commission sought to create competition in, and to promote development of, the enhanced service industry. Likewise, in the Payphone Orders, the Commission is implementing the dual goals of Section 276, "promoting both

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<sup>12</sup> Policy and Rules Concerning Operator Service Access and Pay Telephone Compensation, CC Docket No. 91-35, 11 FCC Rcd 17021, 17027 (1996) (requiring "LECs to offer their federally tariffed international call blocking service on an unbundled basis to all business customers, aggregators and non-aggregators alike") (footnote omitted).

competition among [PSPs] and the widespread deployment of payphone services to the benefit of the general public." Clarification Order, ¶ 3. Thus, the Bureau should reject interpretations of the Clarification Order that hinder payphone competitors from obtaining critical network services at reasonable, cost-based rates.<sup>13</sup> In the BOC ONA Order, the Commission did not require that features must be available *only* to enhanced service providers ("ESPs") in order to be federally tariffed. In applying this Computer III derived requirement to the payphone industry, therefore, the Bureau clearly did not intend to require that payphone-specific features must be available *only* to PSPs in order to be federally tariffed.

In short, CUSTOMNET is a "payphone-specific" feature. U S West is required to federally tariff it under the Payphone Orders.

### CONCLUSION

U S West's attempt to evade its federal tariffing obligations disregards the Bureau's Clarification Order, which specifically cited call screening and call blocking services as payphone-specific features. The Clarification Order also made clear that federal tariffing of payphone-specific features is required for all features that are of particular use to

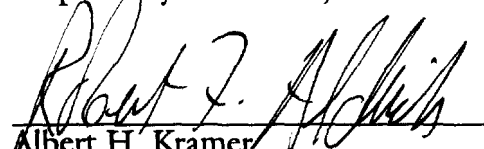
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<sup>13</sup> In fact, the Bureau should be even more vigilant in the implementation of Section 276 because in this context, the BOCs have historically dominated the payphone market and impeded independent PSPs from offering new competition. In the BOC ONA Order, by contrast, the Commission was implementing a regulatory framework that enabled BOCs to enter the enhanced service market for the first time. The need for the Bureau to be vigilant is demonstrated, for example, by U S West's \$5.00 rate for CUSTOMNET, a critical service to PSPs, when U S West's cost of providing the service is only \$0.01.

PSPs, and not only those features predominantly subscribed to by PSPs. Services such as U S West's CUSTOMNET service, which are vital to prevention of fraud and establishing eligibility for payphone compensation, are clearly distinguishable from features such as touchtone, which are "generally available to all local exchange customers *and* ... only incidental to payphone service." Clarification Order, ¶ 18 (emphasis added). The Bureau should reject U S West's CEI Amendment and require U S West to federally tariff CUSTOMNET as a payphone-specific, unbundled feature.

Dated: May 21, 1997

Respectfully submitted,



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Attorneys for the American Public  
Communications Council

# **EXHIBIT 1**

DOCKET FILE COPY ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

RECEIVED

APR 25 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

U S WEST's Comparably Efficient )  
Interconnection Plan for )  
Payphone Services )

CC Docket No. 96-128

Implementation of the Pay Telephone )  
Reclassification and Compensation )  
Provisions of the Telecommunications )  
Act of 1996 )

**AMENDMENT OF PLAN OF U S WEST, INC.  
TO OFFER COMPARABLY EFFICIENT  
INTERCONNECTION FOR PAYPHONE SERVICES**

U S WEST, Inc. ("U S WEST"), pursuant to the Common Carrier Bureau's ("Bureau") Memorandum Opinion and Order and its Clarification Order,<sup>1</sup> hereby amends its Comparably Efficient Interconnection ("CEI") Plan for Payphone Services.<sup>2</sup> Upon the effective date of this Amendment, U S WEST will delete references therein to CUSTOMNET (Outgoing Fraud Protection).

<sup>1</sup> In the Matter of Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, Memorandum Opinion and Order, 10 FCC Rcd. 1724 (1995); In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-678, rel. Apr. 4, 1997 ("Order" or "Clarification Order").

<sup>2</sup> U S WEST's CEI Plan for Payphone Services was approved by the Bureau on Apr. 15, 1997. See In the Matter of U S WEST's Comparably Efficient Interconnection Plan for Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-796, rel. Apr. 15, 1997.

On Monday, April 14, 1997 U S WEST Communications, Inc., under authority of Special Permission No. 97-125 of the Bureau, removed CUSTOMNET from its payphone compliance tariff filing (Transmittal No. 823). This was done because CUSTOMNET does not fit the criteria in the Bureau's Clarifying Order. In that Order the Bureau clarified that the requirement to file federal tariffs applies only to payphone-specific, network-based, unbundled features and functions provided to others or taken by a LEC's operations, and did not include in this federal tariff requirement features and functions that are generally available to all local exchange customers, such as touchtone and various custom calling features.<sup>3</sup>

CUSTOMNET falls in the latter category because it is a feature generally available to all U S WEST end-user customers and is not payphone-specific. Although utilized by U S WEST's payphone operation in its provision of payphone service, CUSTOMNET is also used by numerous end-user customers other than payphone service providers. Based on March 1997 data, more than 70% of CUSTOMNET lines are residential and business lines, not payphone lines. CUSTOMNET, in these respects is very similar to touchtone service. Consequently, U S WEST need not add CUSTOMNET to its federal tariff to be in compliance with the tariff requirements of the Clarification Order. Thus CUSTOMNET was removed from that filing as described above.

In order to be consistent with its corrected Federal Tariff and accurate in its representations in its CEI Payphone Plan, U S WEST respectfully submits this

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<sup>3</sup> Clarification Order ¶ 18.

request to delete the references to CUSTOMNET in its CEI Payphone Plan,  
specifically on page 16 of the CEI Plan and in Exhibits A and B. Attached to this  
Amendment are corrected copies of page 16 and Exhibits A and B. Please replace  
the previous versions of these pages with the versions that are attached to this  
Amendment.

Respectfully submitted,

U S WEST, INC.

By: James T. Hannon  
James T. Hannon  
Suite 700  
1020 19th Street, N.W.  
Washington, DC 20036  
(303) 672-2860

Its Attorney

Of Counsel,  
Daniel L. Poole

April 25, 1997

## **EXHIBIT 2**



U S WEST Communications, Inc.  
1801 California Street Room 4740  
Denver, Colorado 80202  
303 696-1446

John Kure  
Director - Public Policy

**USWEST**  
COMMUNICATIONS ©

January 15, 1997

Transmittal No. 823

Secretary  
Federal Communications Commission  
1919 "M" Street, NW, Room 222 SC1170  
Washington, D.C. 20554

Attention: Common Carrier Bureau

The accompanying tariff material, issued on behalf of U S WEST Communications, Inc. d/b/a U S WEST Communications (USWC) and bearing Tariff F.C.C. No. 5, effective as reflected on the attached tariff pages, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended. This material consists of tariff pages indicated on the following check sheet(s):

Tariff F.C.C. No.  
5

Check Sheet Revision No.  
240th Revision of Page 0-1  
30th Revision of Page 0-1.2  
31st Revision of Page 0-1.3  
17th Revision of Page 0-1.4  
19th Revision of Page 0-1.5  
18th Revision of Page 0-1.17  
45th Revision of Page 0-1.18  
42nd Revision of Page 0-1.19

This filing is being made to comply with the FCC's Orders in CC Docket Nos. 96-128 and 91-35, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996. The filing includes exogenous adjustments to reflect the deregulation of pay telephone sets and a change in NECA Long Term Support. The filing implements the Orders' requirement to apply a multiline business End User Common Line (EUCL) charge to all payphone lines. The filing also restructures the Common Line Charges to recover in the EUCL the revenue requirement for public pay telephone lines formerly recovered in the Carrier Common Line Charge. Tariff language changes have been made to reflect the deregulation of pay telephone sets. Finally, the filing adds four unbundled features currently used by USWC's pay telephone operation in its provision of pay telephone service from smart pay telephones as required by the Orders.

PL

ICE COPY

Secretary  
Transmittal No. 823  
January 15, 1997  
Page Two

Supporting information discussed under Sections 61.38 and 61.49 of the Commission's Rules is, to the extent applicable, included with this filing in the attached Description and Justification.

In accordance with Section 61.32(b), the original Transmittal Letter, the Federal Communications Commission Form 159 and the filing fee have been submitted to a courier service for delivery to the Treasury Department lockbox located at the Mellon Bank in Pittsburgh, Pennsylvania.

In accordance with Sections 61.32(a) and (c), the appropriate tariff pages and attachments are hereby delivered to the Secretary, Federal Communications Commission, their commercial contractor and the Chief, Pricing Analysis Branch. These actions have been committed on the date established as the issued/filed date as reflected above.

Acknowledgment and date of receipt of this filing are requested. A duplicate letter of transmittal is attached for this purpose.

All correspondence and inquiries in connection with this filing, including service copies of petitions, should be directed to:

Ms. BB Nugent  
U S WEST, Inc.  
1020-19th Street, NW, Suite 700  
Washington, DC 20036  
Phone (202) 429-3131  
Facsimile (202) 296-5157

Respectfully,

A handwritten signature in black ink, appearing to be "John W.", written in a cursive style.

Attachments:  
Duplicate Letter  
Tariff Page(s)  
Description and Justification

PUBLIC REFERENCE COPY

U S WEST Communications  
ACCESS SERVICE

TARIFF F.C.C. No. 5  
ORIGINAL PAGE 13-41.9

**13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR  
AND MISCELLANEOUS SERVICES**

**13.3 MISCELLANEOUS SERVICES (Cont'd)**

**13.3.19 BASIC PUBLIC ACCESS LINE (PAL) OPTIONAL FEATURES**

**A. Answer Supervision - Lineside**

This option provides the capability to deliver "off-hook" supervisory signals from the terminating central office switch to a lineside interface at the originating central office switch. These signals indicate when the called station has answered an incoming call. Answer Supervision will only be provided where technically feasible with Basic PAL Service offered in the Company's general or local exchange tariffs. Rates are set forth in 13.4.3., following.

**B. Billed Number Screening**

Billed Number Screening (BNS) prohibits collect and/or third number billing calls from being charged to BNS equipped numbers. Callers attempting to place a collect or third number billing calls using a BNS number for billing will be advised by an operator that such billing is unauthorized and the call will not be completed until other payment or billing arrangements are made. BNS is subject to the availability of facilities with Basic PAL Service offered in the Company's general or local exchange tariffs. Collect and/or third number billed calls originating from locations that do not have screening capabilities may not be capable of being intercepted and denied and will be billed, e.g., International calls and calls that do not go through the Billing Validation Authority (BVA) data base. Provision of BNS does not alleviate customer responsibility for completed toll calls. This service is available to customers at no charge.

(N)

(N)

(Filed under Transmittal No. 823.)

Issued: January 15, 1997

Effective: April 15, 1997

U S WEST Communications  
ACCESS SERVICETARIFF F.C.C. No. 5  
ORIGINAL PAGE 13-41.10**13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR  
AND MISCELLANEOUS SERVICES****13.3 MISCELLANEOUS SERVICES**

(T)

**13.3.19 BASIC PUBLIC ACCESS LINE (PAL) OPTIONAL FEATURES ( (Cont'd)**

(N)

**C. CUSTOMNET Service**

*CUSTOMNET* Service provides toll access screening options which allow a customer to restrict the classes of chargeable calls originating over some or all of their lines. *CUSTOMNET* Service enables a customer, by means of Company operator identification, to provide toll access but restrict (0/0+) outgoing toll calls to only those calls which are charged to the called telephone (collect), a third number, and/or calling card.

*CUSTOMNET* Service is offered to individual PAL customers. Two options, described below, are available with this service. The provision of this service may require some customers to change their existing telephone number.

- Option 1

All local and nonchargeable calls, e.g., calls to 800/800-type service numbers, and calls to Company numbers such as repair and public emergency service numbers (such as 911) will be permitted. Calls dialed 1+, including calls to Directory Assistance, will not be permitted. Calls dialed 0/0+ to Directory Assistance will be permitted if alternate billing is provided.

- Option 2

All local calls, nonchargeable calls and calls dialed 1+ will be permitted. With this option, the customer assumes responsibility for all calls dialed 1+ and indemnifies and saves the Company harmless against claims resulting from abuse or fraudulent use of the service.

*CUSTOMNET* Service is furnished where facilities and operating conditions permit for Basic PAL Service. The Company reserves the right to restrict the screening classes or combinations of classes to standard arrangements. Toll Restriction cannot be applied to lines using *CUSTOMNET* Service. Rates are set forth in 13.4.3., following.

(N)

(Filed under Transmittal No. 823.)

Issued: January 15, 1997

Effective: April 15, 1997

**13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR  
AND MISCELLANEOUS SERVICES**

**13.3 MISCELLANEOUS SERVICES**

(T)

**13.3.19 BASIC PUBLIC ACCESS LINE (PAL) OPTIONAL FEATURES ( (Cont'd)**

(N)

**D. Blocking for 10XXX1+/10XXX011+**

Blocking for 10XXX1+/10XXX011+ prevents 10XXX1+ and 10XXX011+ calls from being completed. Blocked calls will be routed to an announcement. This option is available where facilities and operating conditions permit for Basic PAL Service. Rates are set forth in 13.4.3., following.

(N)

U S WEST Communications  
ACCESS SERVICE

TARIFF F.C.C. No. 5  
1ST REVISED PAGE 13-69.3  
CANCELS ORIGINAL PAGE 13-69.3

13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR  
AND MISCELLANEOUS SERVICES

13.4 RATES AND CHARGES - ALL STATES

13.4.3 CHARGES FOR MISCELLANEOUS SERVICE (Cont'd)

L. Synchronization Service

	USOC	NONRECURRING CHARGE	MONTHLY RATE
• Per Interface at 1.544 Mbps on SONET-based facilities	S1F1S	\$199.00	\$5.00

M. Answer Supervision - Lineside  
• Per PAL line

AS8L+	15.00	3.95
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(N)

N. CUSTOMNET Service  
• Per PAL line

SEA	30.00	5.00
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O. Blocking for 10XXX1+/10XXX011+  
• Per PAL line

RTVXY	4.00	0.10
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(N)

(Filed under Transmittal No. 823.)

Issued: January 15, 1997

Effective: April 15, 1997

**PUBLIC REFERENCE COPY**

**U S WEST COMMUNICATIONS, INC.**

**TARIFF F.C.C. NO. 5**

**ACCESS SERVICE**

**DESCRIPTION AND JUSTIFICATION**

**PAY TELEPHONE COMPLIANCE**

## TABLE OF CONTENTS

<u>Section</u>		<u>Page</u>
1	Introduction and Description	1
1.1	Overview	1
1.2	CCL Exogenous Cost Adjustment	2
1.3	NECA Long Term Support Exogenous Adjustment	3
1.4	Carrier Common Line Rate Adjustment	3
1.5	End User Common Line Rate Adjustment	4
1.6	Tariff Language Changes	4
2	Unbundled Features	5
2.1	Answer Supervision - Lineside	6
2.2	Billed Number Screening	7
2.3	CUSTOMNET Service	8
2.4	Blocking for 10XXX1+/10XXX011+	8
3	Rate Development for Unbundled Features	9
4	Demand and Revenue Impacts for Unbundled Features	10
4.1	Demand	10
4.2	Revenue	10
5	Unit Costs for Unbundled Features	10
5.1	Overview	10
5.2	Development of Recurring Unit Costs	11
5.3	Development of Nonrecurring Unit Costs	12
5.4	Description of Workpapers	13
6	Workpapers	13



Access Line. Language concerning pay telephone sets, in general, has been removed from the tariff entirely or has been replaced, where appropriate, with a reference to Public Access Lines or Pay Telephone Service Providers.

## 2. Unbundled Features

This filing introduces four unbundled features that have been used by USWC's pay telephone operation in the provision of its pay telephone service provided from smart phones.<sup>2</sup> They include: Answer Supervision - Lineside, Billed Number Screening, CUSTOMNET Service, and Blocking for 10XXX1+/10XXX011+. No unbundled features are used by USWC's pay telephone operation in the provision of its pay telephone service provided from "dumb" pay telephones. While the above services are used by USWC's pay telephone operation, it should be noted that these services have been available to independent pay telephone providers in USWC's state exchange services tariffs and have, in fact, been purchased and still are being purchased out of those tariffs by independent pay telephone providers. These features were not available only to USWC. All of these services are, in fact, available on lines other than Public Access Lines purchased out of USWC's state exchange services tariffs. None of these features is required in order to provide service from a smart pay telephone over a Basic PAL line.<sup>3</sup>

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<sup>2</sup>Inclusion of these unbundled features is required by the FCC's Report and Order, CC Dockets No. 96-128 and 91-35, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, released September 20, 1996, ¶¶ 146-148.

<sup>3</sup>USWC's Basic PAL Line is used to provide service to a smart pay telephone. USWC's Smart PAL Line is used to provide service to a "dumb" pay telephone.